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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MBIA INC., Plaintiff, v. CERTAIN UNDERWRITERS AT LLOYD'S, LONDON, LEXINGTON INSURANCE COMPANY and WURTTEMBERGISCHE VERSICHERUNG AG, Defendants.	**No. 14 Civ. 1769 (SAS) (GWG)** **NOTICE OF CROSS-MOTION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Request for Judicial Notice, all exhibits annexed thereto, and upon all prior pleadings and proceedings in this action, Plaintiff MBIA Inc., through its undersigned counsel, will move this Court before the Honorable Shira A. Scheindlin, United State District Court Judge, at the United States District Court for the Southern District of New York, Courtroom 15C, 500 Pearl Street, New York, New York 10007, for an Order, pursuant to Rule 12(c) of the Federal Rules of Civil Procedure, granting Plaintiff judgment on the pleadings with respect to its Fifth Cause of Action seeking a declaration that Defendants Certain Underwriters at Lloyd's, London and Lexington Insurance Company are obligated to pay for Plaintiff's costs of defending against the underlying lawsuits alleged in Paragraph 46 of its Complaint in this action.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's instructions at the April 7, 2014 pre-motion conference, opposing papers, if any, must be served and filed with the Court on or before May 23, 2014, and reply papers, if any, must be served and filed with the Court on or before June 4, 2014.

Dated: New York, New York
May 9, 2014

KASOWITZ, BENSON, TORRES
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By: /s/ Robin L. Cohen

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